



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

WMP:JMK/MTK  
F. #2013R00505

*271 Cadman Plaza East  
Brooklyn, New York 11201*

January 31, 2016

By ECF and Email

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Re: United States v. Robert Bandfield, et al.  
Criminal Docket No. 14-476 (S-1) (ILG)

Dear Counsel:

As stated in its January 4, 2016 opposition to the defendants Robert Bandfield's and Gregg Mulholland's pre-trial motions, the government agreed to identify, by the end of January 2016, ten or fewer manipulated ticker symbols upon which it intends to rely on substantively at trial. The ticker symbols are as follows:

AMWI  
ALZM  
CANA  
CYNK  
ENIP  
PRTN  
PWEI  
SNPK  
SVEN  
VLNX

The government also identifies the following bank records upon which it intends to rely in support of the charges contained in the superseding indictment:

Document Description	Date Produced	Bates Range
Band of New York Mellon Bank Records	8/7/15	EDNY-IPC-17992-17993; 18002-20951
Bank of America Bank Records	8/7/15	EDNY-IPC-17967-17991; 17995
DMS Bank Records	8/10/15	EDNY-TT-00001-00478; 12777-13005
Caledonian Bank Records	8/10/15	EDNY-TT-12549-12719

The government reserves its right to supplement these bank records.

Very truly yours,

ROBERT L. CAPERS  
United States Attorney

By:                     /s/                      
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cc: Clerk of the Court (ILG)